

6. The Commission Should Take Care In Attempting to Lump Different Technologies, In Addressing Loop Capabilities and Functions.

Assuming that loop conditioning must be performed, the Commission should be careful not to place too much emphasis on the use of the term "xDSL" as a generic technology reference. There are several different technologies included under the xDSL label, including IDSL, HDSL, SDSL, VDSL and ADSL. Each of those individual acronyms refer to a different technology, and in some cases to several non-standard technologies. In fact, the use of SDSL itself is "non-standard," as the term is being used to describe several technologies. Correspondingly, in each case, the loop functionalities required are different and also differ depending on their use. Combining these technologies onto loops in the same cables and binder groups would be detrimental to the ongoing integrity of the network unless rigid specifications are adopted and adhered to. These specifications would include the PSD masks developed for IDSL, HDSL and ADSL, with additional masks required for all standardized equipment determined to be compatible within the network and any other criteria that may be required for different equipment. Additionally, strict adherence to an inventory method like LFACS and TIRKS and spectrum management system would be required. The need to spectrum manage will inevitably require the denial of service for offerings requiring these technologies when physical facilities are available but "spectrally exhausted."

7. Beyond Technical Feasibility Issues, Unbundling Loops Passing Through Remote Terminals Will Raise Other Limitations

As an initial matter, the Commission should rule on the petitions for reconsideration on the Advanced Services Order that pertains to loop conditioning prior to moving on to how such loop conditioning will be performed.¹⁶

Assuming that such loop conditioning must be performed, loops provided by remotely located systems, commonly referred to as digital loop carrier ("DLC") systems, are not compatible with technologies such as ADSL and HDSL, since they require the use of a copper pair. In order to use the loop, such high-speed technologies will be required to access the loop at the remote point where it reverts to a copper loop. Other methods would be required at that point to transport the high-speed data signal to the ILEC central office.

Space and power would be considerations at many locations. For example, the available space in a remote terminal will be limited, and the placement of a single DSLAM with its associated cross-connect and powering equipment might exhaust that space. As with all network space, remote terminal space should be made available on a "first come, first served" basis. Additionally, if there is no available space at a given location, it may be impossible to provide new/additional space due to right of way or other building restrictions. In no event does the 1996 Act require ILECs to expand its facilities to provide space for a CLEC's equipment or any support systems required (*e.g.*, new construction to house power, environmental).

¹⁶ See note 4 *supra*. Bell Atlantic also filed a petition for reconsideration that should likewise be resolved.

8. Identical Loop Provisioning Intervals Are Wholly Unrealistic

If SBC understands correctly, it strongly opposes the tentative conclusion that "deployment intervals for provisioning xDSL-compatible loops should be the same for incumbent LECs and competitive LECs, regardless of whether the loop passes through a remote concentration device." NPRM, ¶ 172. If that conclusion suggests that the length of time spent provisioning a loop through a DLC system should be exactly the same as the time taken for provisioning a loop that needs no conditioning of any kind, SBC respectfully suggests that such a standard is wholly unrealistic. Given the differences, the only way an ILEC could likely meet that standard is to *slow down* provisioning to the least common denominator. Such a result would hardly further the objective of section 706, and the Commission should accordingly reject its tentative conclusion.

9. Subloop Unbundling Should Not Be Required

Subloop unbundling should not be required. SBC has always gone to great lengths to safeguard its networks and employees in order to provide a very high rate of reliability to customers. SBC has learned that the best way to limit troubles is to keep hands out of the plant except as required; to provide extensive training to all personnel who access the plant; and to provide strict operational, administrative and maintenance procedures. It is imperative that these high standards be kept in place in order to maintain high levels of service. To allow more personnel less trained or inexperienced into the network with less vested interest in network

integrity and security as a whole is to invite disaster both to our customers' services and possibly the physical safety of those inexperienced personnel.

IV. CONCLUSION

The NPRM is a wide-ranging inquiry, with many important issues being addressed that will affect the goal of section 706. SBC looks forward to its participation in the process.

Respectfully submitted,

SBC COMMUNICATIONS INC.

By: Darryl W. Howard

James D. Ellis
Robert M. Lynch
Durward D. Dupre
Darryl W. Howard

Attorneys for SBC Communications Inc.

One Bell Plaza, Suite 3703
Dallas, Texas 63101
(214) 464-4244

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CERTIFICATE OF SERVICE

I, Robin Ostresh, hereby certify that the foregoing, "COMMENTS OF SBC COMMUNICATIONS INC.," in CC Docket No. 98-147 have been filed this 25th day of September, 1998 to the Parties on the attached service list.

A handwritten signature in cursive script, reading "Robin Ostresh", positioned above a horizontal line.

Robin Ostresh

September 25, 1998

ITS INC
1231 20TH STREET, N.W.
WASHINGTON, D.C. 20036

THE HONORABLE SUSAN NESS CHAIR
COMMISSIONER
FEDERAL COMMUNICATION COMMISSION
1919 M STREET NW RM 832
WASHINGTON DC 20554

THE HONORABLE HAROLD FURCHTGOTT-ROTH
COMMISSIONER
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET NW ROOM 802
WASHINGTON DC 20554

THE HONORABLE WILLIAM E KENNARD,
CHAIRMAN
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET, N.W., ROOM 814
WASHINGTON. DC 20554

THE HONORABLE MICHAEL K POWELL
COMMISSIONER
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET, N.W., ROOM 844
WASHINGTON. DC 20554

THE HONORABLE GLORIA TRISTANI
COMMISSIONER
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET NW RM 826
WASHINGTON DC 20554